

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

FILED

OCT 16 2024

**CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND**

SARAH BUNTURA, Plaintiff

v.

FORD MOTOR COMPANY

and

S2 VERIFY LLC (Registered Agent: Bili Whitford, 8680 Merion Drive, Duluth, Georgia 30097),
Defendants.

Case No. 1:24-cv-1313

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiff, Sarah Buntura, hereby moves this Honorable Court for leave to file an amended complaint in the above-captioned matter pursuant to Federal Rule of Civil Procedure 15(a). In support of this motion, Plaintiff states the following:

1. **Background:** The original complaint was dismissed by the Court due to deficiencies regarding diversity jurisdiction and failure to state sufficient federal claims. Plaintiff has corrected these deficiencies in the proposed amended complaint, which is attached hereto as Exhibit A.
2. **Diversity Jurisdiction:** Plaintiff has established complete diversity of citizenship by providing specific details about the citizenship of all members of S2 VERIFY LLC, confirming that none are residents of Ohio.
3. **Amount In Controversy:** The amended complaint details the actual damages incurred by Plaintiff, including lost wages, emotional distress, and reputational harm, exceeding the required amount in controversy of \$75,000.
4. **Federal Claims:** The amended complaint strengthens the federal claims under the Fair Credit Reporting Act, National Labor Relations Act, and Title VII of the Civil Rights Act of 1964.
5. **No Undue Delay or Prejudice:** This motion is made in good faith and not for the purpose of delay. The Defendants will not be prejudiced by the filing of the amended complaint, as it addresses the specific concerns raised by the Court.
6. **Conclusion:** For these reasons, Plaintiff respectfully requests that this Court grant her leave to file the attached amended complaint.

Dated this 16th day of October, 2024.

Respectfully submitted


Sarah Buntura

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Pro Se Plaintiff